

TECHNICAL REVIEW DOCUMENT
For
MODIFICATION TO OPERATING PERMIT 96OPMO168

Tri-State Generation and Transmission, Inc. – Nucla Station
Montrose County
Source ID 0850001

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July 2007

I. Purpose:

This document establishes the decisions made regarding the requested modifications to the Operating Permit for the Nucla Station. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the original request for modification submitted to the Division on June 18, 2007, various e-mail correspondence and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Permit Modification Request/Modification Type

Tri-State submitted a request on June 18, 2007 to modify the operating permit to install improved drift eliminators on the cooling tower serving turbines 1, 2 and 3 (S401) at Nucla Station. In their request the source indicated that the modification met the requirements for a minor permit modification and requested that the modification be processed under the minor modification procedures in Colorado Regulation No. 3, Part C, Section X. The requested emissions increase is far below the PSD significance levels.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor

permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since requested emissions are below PSD significance levels, the Division agrees that this modification qualifies as a minor modification.

III. Modeling

No modeling of emissions is required since the particulate matter emissions will be reduced and only result in 0.55 tons/yr after the installation of the new drift eliminators.

IV. Discussion of Modifications Made

Source Requested Modifications

The Division addressed the source’s requested modifications as follows:

P401 – Cooling Tower serving Turbines 1, 2 & 3 **Installation of improved drift eliminators**

The following modifications have been made to the permit.

- Drift loss shall not exceed 0.0005% based on circulating flow rate
- Emissions of air pollutants shall not exceed the following limitations (as requested by APEN dated June 12, 2007):
 - o PM 0.55 tons/yr
 - o PM₁₀ 0.55 tons/yr

Tri-State will require some time to install the new drift eliminators. They are currently planning to install them in September 2007. The Division has required compliance with the new emission limits and drift loss percent starting 10/1/2007. Until then, compliance with the old limits (55.2 ton/yr & 0.05%) is acceptable.

Other Modifications

In addition to the requested modifications made by the source, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions to the Nucla Operating Permit with the source's requested modifications.

Section III – Permit Shield

The citation in the permit shield was corrected. The reference to Part A, Section I.B.43 was changed to Part A, Section I.B.44 and the reference to Part C, Section XIII was changed to Part C, Section XIII.B.

Section IV – General Conditions

The most recent version of the General Conditions has been inserted into the permit to reflect the current APCD Regulations.

Appendix B & C

The most recent language for Appendix B & C has been included with this permit. The reference to “upsets” has been replaced with “malfunctions”. Sources no longer need to identify if data was continuous.

Appendix D

EPA's mailing address was updated.